

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

Santana Bryson and Joshua Bryson,  
as Administrators of the  
Estate of C.Z.B., and as surviving  
parents of C.Z.B., a deceased minor,

Plaintiffs,

v.

Rough Country, LLC

Defendant.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

Civil Action File

No. 2:22-cv-17-RWS

**NOTICE OF VIDEOTAPED DEPOSITION OF KEN DUNN  
FOR USE AT TRIAL**

**TO: Ken Dunn  
CEO, Rough Country, LLC  
c/o Richard H Hill, II, Esq.  
Lindsay G. Ferguson, Esq.  
Claire C. Murray, Esq.  
Aaron B. Chausmer, Esq.  
Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC  
3344 Peachtree Road, NE, Suite 2400  
Atlanta, GA 30326**

COMES NOW the Plaintiffs in the above-captioned matter and hereby  
notice the trial videotaped deposition of Ken Dunn. The deposition will begin  
Wednesday, March 19, 2025, at 10:00 a.m. at the office of Weinberg, Wheeler,  
Hudgins, Gunn & Dial, LLC, 3344 Peachtree Road, NE, Suite 2400, Atlanta,  
GA 30326. The deposition will be by oral examination, on cross-examination,

before an officer duly authorized to administer oaths for all purposes permitted by the Federal Rules of Civil Procedure including use at trial. The deposition will be recorded by stenographic and audiovisual means.

Respectfully submitted this 13<sup>th</sup> day of January, 2025.

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella

TEDRA L. CANNELLA

Georgia Bar No. 881085

tedra@cannellasnyder.com

ROBERT H. SNYDER, JR.

Georgia Bar No. 404522

rob@cannellasnyder.com

DEVIN L. MASHMAN

Georgia Bar No. 257588

devin@cannellasnyder.com

315 W. Ponce de Leon Ave.

Suite 885

Decatur, GA 30030

(404) 800-4828

(404) 393-0365 (fax)

***ATTORNEYS FOR PLAINTIFFS***

## **CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in 14-point Times New Roman font.

CANNELLA SNYDER LLC

*/s/ Tedra L. Cannella*

---

TEDRA L. CANNELLA

Georgia Bar No. 881085

tedra@cannellasnyder.com

ROBERT H. SNYDER, JR.

Georgia Bar No. 404522

rob@cannellasnyder.com

DEVIN L. MASHMAN

Georgia Bar No. 257588

devin@cannellasnyder.com

315 W. Ponce de Leon Ave.

Suite 885

Decatur, GA 30030

(404) 800-4828

(404) 393-0365 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *NOTICE OF VIDEOTAPED DEPOSITION OF KEN DUNN FOR USE AT TRIAL* was electronically filed with the Clerk of Court via CM/ECF, which will automatically serve the following attorneys of record:

Richard H. Hill  
Claire C. Murray  
Lindsay G. Ferguson  
Aaron B. Chausmer  
3344 Peachtree Road, N.E.  
Suite 2400  
Atlanta, GA 30326  
rhill@wwhgd.com  
cmurray@wwhgd.com  
lferguson@wwhgd.com  
achausmer@wwhgd.com

This 13<sup>th</sup> day of January, 2025.

CANNELLA SNYDER LLC

/s/ Tedra L. Cannella  
Tedra L. Cannella  
Georgia Bar No. 881085  
*Attorney for Plaintiffs*